

CULPEPPER IP, LLLC
Kerry S. Culpepper, Bar No. 9837
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Telephone: (808) 464-4047
Facsimile: (202) 204-5181
E-Mail: kculpepper@culpepperip.com

Attorney for Plaintiffs
Venice PI, LLC,
MON LLC,
Millennium Funding, Inc.,
Bodyguard Productions, Inc.,
TBV Productions, LLC,
UN4 Productions, Inc., and
Hunter Killer Productions, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

Venice PI, LLC et al.,) **Case No.: 1:19-cv-169-LEK-KJM**
Plaintiffs,) **(Copyright)**
vs.)
Doe 1 et. al.,) **PLAINTIFFS' SECOND MOTION**
Defendants.) **FOR LEAVE TO FILE FIRST**
) **AMENDED COMPLAINT;**
) **DECLARATION OF COUNSEL;**
) **EXHIBITS 1-2**
)
)
)
)

**PLAINTIFFS' SECOND MOTION FOR LEAVE TO FILE FIRST
AMENDED COMPLAINT**

COME NOW, Plaintiffs Venice PI, LLC, MON LLC, Millennium Funding,
Inc., Bodyguard Productions, Inc., TBV Productions, LLC, UN4 Productions, Inc.,

and Hunter Killer Productions, Inc. by and through their counsel, move for leave to amend the complaint. This motion is brought pursuant to pursuant to Rule 15(a)(2) of the *Federal Rules of Civil Procedure*.

DATED: Kailua-Kona, Hawaii, October 24, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs